

MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JOHANA V. CASTRO
Assistant Corporation Counsel
phone: (212) 788-0976
fax: (212) 788-9776
email: jcastro@law.nyc.gov

MEMO ENDORSED

July 15, 2008

BY HAND

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Time to respond to
complaint of all defendants
extended to September 15.
Conference adjourned
from August 8 to
September 19, 2008 at 11:15 a.m.*

Re: Jabar Cooper v. City of New York et al., 08 CV 5390 (PKC)

Dear Judge Castel:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the above-referenced case. I am writing with the consent of plaintiff's counsel, Brett Klein, Esq., to respectfully request a sixty-day enlargement of time, from July 17, 2008 to September 15, 2008 within which the City may answer or otherwise respond to the complaint. If the Court is so inclined to grant this request, it is further respectfully requested that the initial conference currently scheduled for August 8, 2008 at 10:45 AM be adjourned to a later date and time convenient to the Court after issue has been joined.

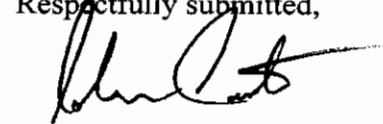
The complaint alleges, inter alia, that plaintiff Jabar Cooper was falsely arrested, imprisoned, subjected to excessive force and maliciously prosecuted. Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. To this end, the City will need to obtain releases from plaintiff to access the underlying arrest and criminal court records regarding this action. The enlargement of time will therefore afford us the opportunity to investigate the matter.

No previous request for an enlargement of time has been made. Accordingly, it is respectfully requested that the City's time to respond to the complaint be extended to September 15, 2008. Additionally, if the Court is so inclined to grant this request, it is further respectfully requested that the initial conference scheduled for August 8, 2008 at 10:45 AM be adjourned to a later date and time convenient to the Court after issue has been joined.

*SO ORDERED
JVC
USDS
7-16-08*

Thank you for your consideration in this regard.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Johana Castro', with a long horizontal flourish extending to the right.

Johana Castro (JC 1809)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: BY FAX
(718) 522-3225
Brett Klein, Esq.
Attorney for Plaintiff
45 Main Street, Suite 230
Brooklyn, NY 11201